

REMARKS

By this amendment, claims 1 and 22 have been amended. Accordingly, claims 1-34 are currently pending in the application, of which claims 1, 17, and 22 are independent claims. Applicant appreciates the indication that claims 2-14, 23-30, and 33-34 contain allowable subject matter.

Applicant respectfully submits that the above amendments do not add new matter to the application and are fully supported by the specification. Support for the amendments may be found at least in Figure 5 and at page 7, lines 22-23 of the specification.

Entry of the Amendments and Remarks is respectfully requested because entry of Amendment places the present application in condition for allowance, or in the alternative, better form for appeal. No new matters are believed to be added by these Amendments. In view of the above amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Rejections Under 35 U.S.C. §112, first paragraph

Claims 1-16, and 22-34 stand rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement (paragraph 1a of Paper 6) and as failing to comply with the enablement requirement (paragraph 1b of Paper 6). Applicant respectfully traverses these rejections for at least the following reasons.

The Examiner's argument is that the limitations added to claim 1 and to claim 22 are (a) new matter and (b) not described in an enabling way. With regard to the latter argument, it is respectfully submitted that no special teaching is required to enable one of ordinary skill in the

art to make electrical connections. Accordingly, the specification may simply indicate a connection to be made without precisely explaining a mechanism (for example, soldering) to enable the connection. The Examiner has not suggested that this situation has any facts which would suggest that making the claimed connection would require some skill or technique that is neither part of the art nor taught in the specification. Applicant accordingly respectfully suggests that this rejection is misplaced. In any event, Applicant has amended the claim which removes the language which was the basis of this rejection. Accordingly, this rejection is moot.

With regard to the new matter argument, Applicant respectfully notes that support for the claimed elements may be found at least in Figure 5 and the associated text. However, Applicant notes that Applicant has amended the claim which removes the language which was the basis of this rejection. Accordingly, this rejection is moot.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §112, first paragraph rejection of claims 1-16 and 22-34.

Rejections Under 35 U.S.C. §102

Claims 1, 15-18, 22, and 31-32 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,580,408 issued to Bae, *et al.* (“Bae”). Applicant respectfully traverses this rejection for at least the following reasons.

In order to anticipate, the cited reference must teach each and every limitation of the claim. With regard to claim 1 and dependent claims 15-16, what is claimed includes the following limitation: “a diode means second TFT having a gate coupled to the gate of the first TFT and compensating for a threshold voltage deviation of the first TFT.” Claim 1 (as currently

amended). The cited reference, *Bae*, does not teach at least this limitation. Accordingly, the cited reference does not anticipate independent claim 1 and dependent claims 15-16.

With regard to independent claim 17 and dependent claim 18, what is claimed includes the following limitation: “compensating the supplied data voltage to reduce a threshold voltage deviation of a current driving TFT.” (Claim 17 as previously amended). Applicant notes that the Examiner does not cite any portion of the reference to support a conclusion that the reference teaches this limitation. However, the reference does not teach this limitation. In contrast, the reference teaches the following: “To overcome the problems described above, preferred embodiments of the present invention provide an ELD having uniform brightness throughout the whole display by **supplying the respective EL diodes with uniform drive currents with the use of a current mirror**, even though the V_{TH} of the switching devices in each pixel is not the same.” (Col. 2, ll. 18-24) (bold emphasis supplied, italic emphasis in original). Note that the reference explains that “ V_{TH} ” is the threshold voltage. Consequently, the reference apparently teaches an approach that ignores “ V_{TH} ” because it is using uniform drive current. Thus, the cited reference, *Bae*, does not teach at least this limitation. This missing element is unsurprising because it appears that *Bae* refers to a current programming method as opposed to a voltage programming method. Accordingly, the cited reference does not anticipate independent claim 17 and dependent claim 18.

With regard to independent claim 22 and dependent claims 31-32, what is claimed includes the following limitation: “a second TFT having a gate coupled to a gate of the first TFT, and the gate and a drain of the second TFT being coupled together.” (Claim 22 as currently amended). Applicant notes that the Examiner has not explained how the cited reference teaches

this limitation. Additionally, as illustrated by *Bae*'s Figure 3, the cited reference does not teach this limitation. Accordingly, the cited reference does not anticipate independent claim 22 and dependent claim 31-32.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection of claims 1, 15-18, 22, and 31-32. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicant respectfully submits that independent claims 1, 17, and 22, and all the claims that depend from them are allowable.

Rejections Under 35 U.S.C. §103

Claims 19-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Bae* in view of U.S. Patent No. 6,229,508 issued to *Kane, et al.* ("*Kane*"). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 19-21 are dependent claims that ultimately depend from claim 17. As explained above, *Bae*, does not teach at least the element "compensating the supplied data voltage to reduce a threshold voltage deviation of a current driving TFT." (Claim 17 as currently amended). Indeed, *Bae*'s alternative approach (described above) to solving the problem in the art teaches toward that approach and away from the approach of the present invention. Accordingly one of ordinary skill in the art would find no teaching, motivation, or suggestion to combine *Bae* with another reference to yield the claimed method.

Moreover, assuming *arguendum* that *Bae* were a proper primary reference, *Kane* is an insufficient secondary reference because it does not remedy the deficiencies of *Bae*. In particular, *Kane* does not teach "compensating the supplied data voltage to reduce a threshold

voltage deviation of a current driving TFT.” (Claim 17 as currently amended). Indeed, *Kane*’s approach is to “incorporate[] a LED … pixel structure and method that … reduc[es] current nonuniformities.” (Col. 2, ll. 10-12).

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claims 19-21. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicant respectfully submits that independent claim 17, and all the claims that depend from it are allowable.

Allowable Subject Matter

Applicant appreciates the indication that claims 2-14, 23-30, and 33-34 contain allowable subject matter. The base claims upon which these claims depend have been amended, and it is believed that those base claims, in view of the arguments presented in this reply, are in condition for allowance.

Accordingly, Applicant submits that claims 2-14, 23-30, and 33-34 are also in condition for allowance.

CONCLUSION

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



Hae-Chan Park
Reg. No. 50,114

Date: July 6, 2004

McGuireWoods LLP
1750 Tysons Boulevard
Suite 1800
McLean, VA 22102-4215
Tel: 703-712-5365
Fax: 703-712-5280
HCP:WSC/bjb